# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA NEWPORT NEWS DIVISION

ROYCE SOLOMON, et al., individually and on behalf of all others similarly situated,

Plaintiffs,

v.

AMERICAN WEB LOAN, INC., et al.,

Defendants.

Civil Action No. 4:17-cv-0145-HCM-RJK

CLASS ACTION

# PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Plaintiffs Royce Solomon, Jodi Belleci, Michael Littlejohn, and Giulianna Lomaglio, on behalf of themselves and the Settlement Class<sup>1</sup> (collectively, "Plaintiffs" or the "Settlement Class Representatives"), hereby move the Court pursuant to Fed. R. Civ. P. 23 for final approval of the class action Settlement and for entry of the attached proposed Final Approval Order.

In support of this motion, Plaintiffs are filing a memorandum in support of this motion with the following exhibits:

- 1. Exhibit 1 Declaration of Professor Yair Listokin in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement, dated September 3, 2020; and
- 2. Exhibit 2 Declaration of Eric Schachter on Behalf of the Settlement Class Administrator, A.B. Data, Ltd., Regarding Notice and Claims Administration, dated September 3, 2020.

<sup>&</sup>lt;sup>1</sup> Unless otherwise defined herein, capitalized terms shall have the meanings ascribed to them in the Settlement Agreement dated April 14, 2020 (the "Settlement Agreement"), attached as Exhibit A to the Memorandum in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (ECF No. 414).

In further support of this motion, Plaintiffs are filing contemporaneously herewith the Joint Declaration of Kathleen M. Donovan-Maher and Matthew B. Byrne in Support of (A) Plaintiffs' Motion for Final Approval of Class Action Settlement and (B) Class Counsel's Motion for an Award of Attorneys' Fees, Reimbursement of Expenses, and Service Awards to the Settlement Class Representatives.

Plaintiffs have conferred with Defendants, who do not oppose the filing of this motion.

DATED: September 4, 2020 MICHIEHAMLETT

## \_/s/ David W. Thomas\_

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Settlement Class Counsel

# **CERTIFICATE OF SERVICE**

I hereby certify that on the 4th day of September, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all counsel of record.

<u>/s/ David W. Thomas</u>
David W. Thomas, Esq.